

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MEMO ENDORSED

THEODORE PARISIENNE,

Plaintiff,

- against -

4CONTROL MEDIA, INC.,

Defendant.

Docket No. 17-cv-10076(LAK)

**NOTICE OF MOTION OF
PLAINTIFF'S MOTION FOR
ENTRY OF DEFAULT
JUDGMENT AGAINST
DEFENDANT PURSUANT TO
FED.R.CIV.P. 55(b)(2) and
L.R. 55.2 DC SDNY**

DOCUMENT

ELECTRONICALLY FILED

DOC #:

DATE FILED: 4/27/2018

PLEASE TAKE NOTICE that, upon the annexed declaration of Richard P. Liebowitz, Esq., dated March 16, 2018, and the exhibits attached thereto; the Clerk's Certificate of Default attached hereto as Exhibit A; the complaint and exhibits attached hereto as Exhibit B; the summons attached hereto as Exhibit C; the affidavit of service attached hereto as Exhibit D; and the proposed order and default judgment attached hereto as Exhibit E; Plaintiff Theodore Parisienne ("Plaintiff") will move the Court, before the Honorable Lewis A. Kaplan (U.S.D.J.), at Courtroom 21B of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure in Plaintiff's favor on the issues of liability and statutory damages of \$30,000 for copyright infringement against Defendant 4Control Media, Inc. ("Defendant"); for Plaintiff's attorneys' fees and costs in the amount of \$3,570 and \$500, respectively; and for such further relief as this Court deems just and proper.

Dated: Valley Stream, New York

April 2, 2018

Respectfully submitted,

LIEBOWITZ LAW FIRM

By: /richardpliebowitz/

Richard P. Liebowitz
11 Sunrise Plaza, Suite 305
Valley Stream, New York 11580
(516) 233-1660

Attorneys for Plaintiff VSL

Granted to the extent that
plaintiff recover \$75 plus
\$400 in costs. Denied in
all other respects including
attorney fees. No prejudicial
rancorous true records.

SO ORDERED


LEWIS A. KAPLAN, USDJ

4/27/18